

IN THE SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
CIVIL DIVISION

ACCELERANT STUDIOS LLC, :
 :
 Plaintiff, :
 :
 vs. : Case No. 2019 CA 002704 C
 :
 SONORAN POLICY GROUP, LLC, :
 :
 Defendant. :
 :
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**DEFENDANT SONORAN POLICY GROUP, LLC'S
ANSWER TO PLAINTIFF'S COMPLAINT**

Defendant Sonoran Policy Group, LLC ("SPG"), by undersigned counsel, hereby answers Plaintiff's Complaint as follows:

1. Paragraph 1 of the Complaint sets out jurisdictional conclusions of law to which no response is presently required.
2. Paragraph 2 of the Complaint is denied.
3. Paragraph 3 of the Complaint is denied.
4. Paragraph 4 of the Complaint is denied.
5. SPG restates and incorporates its prior responses to Paragraphs 1 through 4 as if set forth in full herein.
6. Paragraph 6 of the Complaint is denied.
7. Paragraph 7 of the Complaint is denied.
8. Paragraph 8 of the Complaint is denied.
9. Paragraph 9 of the Complaint is denied.
10. Paragraph 10 of the Complaint is denied.

11. SPG admits that there appears to be attached to the Complaint a copy of a web page from the Department of Corporations and Regulatory Affairs setting forth that SPG is a valid Arizona corporation registered to do business in D.C.

12. Paragraph 12 of the Complaint is denied.

AFFIRMATIVE AND OTHER DEFENSES

FIRST DEFENSE

The Complaint fails to state a claim upon which relief may be granted.

SECOND DEFENSE

Plaintiff's claims are barred by the doctrine of unclean hands.

THIRD DEFENSE

Plaintiff's damages, if any, are the result of Plaintiff's own actions.

FOURTH DEFENSE

Plaintiff's claims are void because there was no meeting of the minds regarding any alleged contract for services.

FIFTH DEFENSE

Plaintiff's claims are void because there was no meeting of the minds regarding a fee relating to the Fair Property Taxes for all New Jersey Project as alleged in the attachment to the Complaint.

SIXTH DEFENSE

Plaintiff's claims are void because there was no meeting of the minds regarding a fee relating to SPG Global Investment Web Site as alleged in the attachment to the Complaint.

SEVENTH DEFENSE

Plaintiff's claims as alleged in the Complaint are subject to the statute of frauds.

EIGHTH DEFENSE

Plaintiff's purported causes of action are barred by the applicable statute of limitations.

NINTH DEFENSE

Plaintiff's purported causes of action are barred by the doctrine of accord and satisfaction.

TENTH DEFENSE

Plaintiff's purported causes of action are barred by a lack of privity.

ELEVENTH DEFENSE

Plaintiff's purported causes of action are barred due to a lack of standing.

TWELFTH DEFENSE

Plaintiff's purported causes of action are barred in whole or in part by the doctrine of setoff.

THIRTEENTH DEFENSE

Plaintiff's purported causes of action are barred in whole or in part due to payment.

FOURTEENTH DEFENSE

Plaintiff's purported causes of action are barred due to fraud, deceit, or misrepresentation.

FIFTEENTH DEFENSE

Plaintiff's purported causes of action are barred by the doctrine of waiver.

SIXTEENTH DEFENSE

Plaintiff's purported causes of action are barred in whole or in part due to a failure to mitigate.

SEVENTEENTH DEFENSE

Plaintiff's purported causes of action are barred due to a lack of consideration.

EIGHTEENTH DEFENSE

No contract was formed as there was no offer and acceptance.

NINETEENTH DEFENSE

Plaintiff's purported causes of action are barred by the doctrine of recoupment.

SPG hereby reserves the right to raise any additional defenses, crossclaims and/or third party claims not asserted herein of which it may become aware through discovery or other investigation.

WHEREFORE, SPG prays that Plaintiff's Complaint be denied in its entirety; that judgment be entered in favor of SPG on all counts; that SPG be awarded its costs and attorneys' fees, and for such other relief as the Court may find just and proper.

Respectfully submitted,

/s/ Daniel A. Brown

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 19th day of June 2019, a true copy of the foregoing was served by CaseFileExpress on all counsel of record.

/s/ Daniel A. Brown _____
Daniel A. Brown